parative negligence, in relation to injuries incurred by employees of interstate railway carriers, was held to be constitutional in *Mondou* v. *New York, N. H. & H. R. Co.* (1912), 32 Sup. Ct. 169. See NOTE AND COMMENT, p. 478 *ante*.

COMMERCE—STATE REGULATION—INTOXICATING LIQUORS—CARRIER'S REFUSAL TO ACCEPT.—A brewing company in Indiana offered a shipment of liquor to the defendant carrier for delivery in Kentucky. It was consigned to localities in that State where local option prohibitory laws prevailed, making transportation of such shipments unlawful. The defendant carrier, incorporated under the laws of Kentucky, refused to accept the shipment. *Held*, that the shipment was interstate commerce; that the statute of a State as applied to such interstate shipment is an unlawful regulation of commerce and of no force; that the carrier, not being bound by such law, must accept the shipment. *Louisville & Nashville Ry. Co.* v. *F. W. Cook Brewing Co.* (1912), 32 Sup. Ct. 189.

The decision, while a logical development, *Lord* v. *Steamship Co.*, 102 U. S. 541, 26 L. Ed. 224; *Hanley* v. *Kansas City Ry. Co.*, 187 U. S. 617, 47 L. Ed. 333; *Grimes* v. *Eddy*, 126 Mo. 168, 26 L. R. A. 638; *Selvege* v. *St. L. etc. Ry.*, 135 Mo. 163, 36 S. W. 652; is yet not in keeping with the spirit of the Wilson Act. The States, under their police power, could always constitutionally prohibit certain sales of liquor within their borders. *Mugler* v. *Kansas*, 123 U. S. 623. But prior to the so-called Wilson Act, this power did not extend to a sale by an importer while in the original package. *Brown* v. *Maryland*, 12 Wheat. 419; *Leisy* v. *Hardin*, 135 U. S. 100, 34 L. Ed. 128. The Wilson Act modified the "original package" doctrine, but *only* as to commerce in liquor. *Heyman* v. *Southern Ry. Co.*, 203 U. S. 270. It did not affect the power of Congress over interstate commerce as such. It simply permits the State to exercise its police powers, over the *liquor* commerce, immediately upon the "arrival" of the goods in the hands of any citizen of the legislating State, and even while in the original package. *In re Rahrer*, 140 U. S. 545, 35 L. Ed. 572; *Meyer, Jossen & Co.* v. *Mobile*, 147 Fed. 843; *Cantini* v. *Tillman*, 54 Fed. 969. The "arrival" point is not reached however, until the transit is ended. This is upon delivery to the consignee. Whether arrival at destination and the lapse of sufficient time after proper notice to consignee constitutes "arrival," is not determined. *Heyman* v. *Southern Ry. Co.*, 203 U. S .270; *Westheimer & Sons* v. *Habinck*, 131 Iowa 643; 9 CUR. LAW 584-7.

CONSTITUTIONAL LAW — EQUAL PROTECTION — DISCRIMINATION IN LICENSE TAX.—The State of Montana passed a law taxing laundries, exempting from its scope all steam laundries, and all women engaged in the laundry business where not more than two women were employed. It was attacked as discriminating in such a way, between instrumentalities employed in the same business and between women and men, as to deny the equal protection of the law to men operating hand laundries. *Held*, (Mr. Justice LAMAR dissenting) to be a reasonable basis of distinction and not in violation of the Fourteenth Amendment of the Constitution of the United States. *Quong Wing* v. *Kirkendall* (1912), 32 Sup. Ct. 192.

The broad economic viewpoint of woman's position, as recognized in *Muller* v. *Oregon*, 208 U. S. 412, is, in this case, adapted and applied to license